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OFFICE OF THE SECRETARIAT

May 16, 2005

BY EMAIL

Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: Certification: New York Mercantile Exchange, Inc.
Submission #05.85 (Listing of Additional Strike Prices for the
Gold, Copper and Natural Gas Option Contracts)

Dear CFTC Commissioners:

Pursuant to COMEX Rule 15.03(C), COMEX Rule 17.04 and NYMEX Rule 300.20, the President of the New York Mercantile Exchange, Inc. ("Exchange") has directed that additional strike prices be added for certain contract months in the Gold, Copper and Natural Gas option contracts as detailed below:

- (A) On May 12, 2005, the Exchange added a call and a put:
1. at the strike price of 395 for the July 2005 contract month of the Gold option contract;
 2. at the strike price of 142 for the August 2005 contract month of the Copper option contract;
 3. at the strike price of 10150 for the October 2005 contract month of the Natural Gas option contract;
 4. at the strike price of 5900 for the March 2006 contract month of the Natural Gas option contract;
- (B) On May 13, 2005, the Exchange added a call and a put:
5. at the strike price of 124 for the July 2005 contract month of the Copper option contract;

6. at the strike price of 5600 for the March 2006 contract month of the Natural Gas option contract;

7. at the strike price of 6450 for the March 2008 contract month of the Natural Gas option contract;

8. at the strike price of 6450 for the June 2008 contract month of the Natural Gas option contract;

9. at the strike price of 6450 for the September 2008 contract month of the Natural Gas option contract;

10. at the strike price of 6450 for the December 2008 contract month of the Natural Gas option contract;

(C) On May 16, 2005, the Exchange added a call and a put:

11. at the strike price of 132 for the June 2005 contract month of the Copper option contract; and

12. at the strike price of 7600 for the December 2005 contract month of the Natural Gas option contract.

Pursuant to the terms of COMEX Rule 15.03(C), COMEX Rule 17.04 and NYMEX Rule 300.20, the strike prices noted above are in increments that are consistent with the pricing for the underlying futures contract. COMEX Rule 15.03(C), COMEX Rule 17.04 and NYMEX Rule 300.20 permit such directed strike prices to be effective upon adoption, provided that notice to the CFTC is given within three business days of the strike price listing.

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Should you have any questions concerning the above, please contact the undersigned at (212) 299-2207.

Very truly yours,

Brian Regan
Vice President & Counsel

cc: Christopher K. Bowen
George Henderson
Michael Campanelli
Donna Talamo